

Comparison Of Polygamy Laws Between Indonesia, Egypt And Kenya

Maswandi¹, Riswan Munthe², Nanang Tomi Sitorus³
maswandi@uma.ac.id¹, riswan@staff.uma.ac.id², nanang@staff.uma.ac.id³

^{1,2,3}Fakulty of Law, Universitas Medan Area, Medan, Indonesia

Article Info

Received: 2024-03-22
Revised: 2024-12-11
Accepted: 2024-12-20

Keywords:

Comparison, Polygamy,
Marriage

Abstract

Polygamy is a marriage in which one of the parties having or marrying someone of the opposite sex simultaneously. Experts distinguish the term for a man who have more than one wife with the term polygyny and for a women who have more than one husband use the term polyandry. Therefore, a marriage performed by a man who have more than one wife at the same time called polygyny is not polygamy. Polygamy in Indonesia is regulated in the Marriage Act 1974, KHI and Government Regulation No. 9 of 1975 on the implementation of the law Article 9/1975), for the country of kenya mentioned in Article 49 paragraph 3 of the Kenya Marriage Act of 2014 as well as the law Egypt Article 11 of Bis law No. 25 of 1929 as amended by law No. 100 of 1985. The research method used is normative legal research with a statute legal approach and a conceptual approach. Results: Indonesia allows polygamy with the permission of the wife and the Religious Court as a form of legal order with maximum limit of four wives, in accordance with the rules contained in the act marriage law and KHI. The Marriage Act of Kenya allow polygamy with the provisions included in the marriage potentially polygamous or polygamous as well as only require voluntary between men and women who will marry without setting limits on the number maximum in polygamy while enurut law Egypt Article 11 Bis of Law No.25 of 1929 as amended by Law No.100 of 1985 husband he must inform his first wife in court of the want to do a second marriage

I. Introduction

Marriage is a common and valid for all his creatures, both in humans, animals and plants. According to the Quran a Muslim is one who has absolutely surrendered to Allah and his commands and believes in pure Tawhid (the on his creatures to multiply and preserve life ¹. Mention of the term marriage is commonly referred to as marriage, in the language Indonesia "marriage" comes from the word "mating" which means to form families of the opposite sex ². The term " marriage" is used generically for humans, animals and plants to show the generative process natural. While the term marriage is only used in humans because contain national legal validity, Customs and religion ³.

The purpose of marriage according to Islamic law is to meet religious call to preserve oneself from evil and corruption, obtain and carry out offspring, foster seriousness to be responsible for accepting rights and obligations, also meant to acquire wealth, and to family to build society and civilization. The families are the first place for a child to get an education, so marriage also aims to organize the family, develop and teaching religious education as the basis of education and the process personality growth of the next generation in the family that ultimately can be useful for nusa nation and religion ⁴.

In general, people assume that polygamy comes from Islamic law, but if traced the history of polygamy has actually been done by previous people before the existence of Islamic law. For example, the "Salafiyun " namely the countries that are now called Russia, Letonia, Czechoslovakia (Czech Republic and Slovakia), Yugoslavia (Serbia and Montenegro), parts of Germany and the United Kingdom. kings previous view that the number of wives is pride distinctive, a symbol of high social status and signifying well-being. King Solomon had seven hundred wives and hundreds of concubines. Nigerian king in Africa has thousands of wives, even a fantastic record is achieved The King of Uganda had seven thousand wives.

Marriage law in Indonesia basically adheres to the system marriage with the principle of open monogamy, meaning that Indonesia regulates a man can only have one wife. Indonesia also it is not forbidden if there is a man who wants to be polygamous ⁵. Proven

¹ Elva Mahlida, 'Penafsiran Poligami (Studi Perbandingan Tafsir Muhammad 'Ali Al-Sabuni Dan Siti Musdah Mulia)', 2017.

² La Ode Gusman Nasiru Salam dan Eka Sartika, 'Poligami Dan Pelakor , Refleksi Dalam Film Dan Realitas Masyarakat Gorontalo : Sebuah Studi', *Jurnal Bahasa, Sastra, Dan Budaya*, 13.2 (2023), p.112.

³ Yudi Prihartanto Soleh, 'Pembaharuan Undang-Undang Perkawinan Perihal Poligami Berdasarkan Hukum Perkawinan', *Jurnal Soshum Insentif.*, 2.1 (2019), p.2 <<https://jurnal.ildikti4.or.id/index.php/jurnalsoshum/article/view/42>>.

⁴ Mustofa Dedi Supriyadi, *Perbandingan Hukum Perkawinan Di Dunia Islam* (Bandung: Pustaka Setia, 2011).

⁵ Rusji Rumbia, Fokky Fuad Wasitaatmadja, and Susianto Susianto, 'Poligami Indonesia Dan Malaysia Sebuah Perbandingan Atas Keberlakuan Hukum Islam', *Jurnal Magister Ilmu Hukum*, 5.2 (2021), p.4-8 <<https://doi.org/10.36722/jmih.v5i2.791>>.

with Article 3 Paragraph (1) of the law of the Republic of Indonesia Number 16 Year 2019 on amendments to Law No. 1 of 1974 about marriage (State sheet of the Republic of Indonesia year 2019 number 186) jo Law No. 1 of 1974 on marriage (sheet State of the Republic of Indonesia in 1974 Number 1) (hereinafter referred to Marriage Act), that a man may only have a wife and a woman should only have one husband ⁶.

However, under this article polygamy is not necessarily prohibited, because in the next chapter a husband may have more than one wife one if it meets the terms and conditions contained in Article 3 paragraph (2) and Article 4 paragraph (1) and (2) of the Marriage Act that someone who will do polygamy must meet the conditions certain regulated by law. if any or all of the conditions is fulfilled, then the permission of the wife and the court of a man they can do polygamy ⁷.

Polygamy is allowed if a person is eligible and provisions that have been regulated by law. Muslim bound more specific arrangements in the compilation of Islamic law (Presidential Instruction Number 1 of 1991) (hereinafter referred to KHI), where someone who will polygamy should be fair to wives and children- your child is a prerequisite. KHI also set limits for a man who marries more than one woman with restrictions maximum of four people.

Marriage Act 1974 although based on monogamy, but the basis of this monogamy is not closed but open monogamy. This principle of open monogamy appears from the regulation of the Marriage Act 1974 Article 3 Paragraph (2), Article 4 paragraph (1) and (2) and Article 5 verses (1) and (2) as well as the compilation of Islamic law (hereinafter written KHI) Chapter IX articles 55-59 ⁸. Although legally based on the Marriage Act 1974 opened irregularities against the principle of monogamy, in other words it is possible the existence of polygamy, but in society this is still a discussion of pros and cons. Those who oppose or oppose polygamy is based on its negative effects are enormous for the family and hurt a lot women ⁹. Though Article 1 of the 1948 Universal Declaration of Human Rights that every human being Is Born Free and equal in dignity and rights. They are endowed with reason and conscience and must act towards each others in the spirit of brotherhood. In the explanation section it is said that each humans actually have the same rights and treatment, but in reality it is not work like that unless there are differences caused by human it is it self that is a complex creature. Ismail Marzuki in his research also it has been stated that along with the development of thought among the scholars contemporary and demands for equal rights between men and women, marriage polygamy is widely opposed. Polygamous marriage is considered a form of marriage that

⁶ Tihami and Sobari Sahrani, *Fiqh Munakahat: Kajian Fiqih Lengkap* (Jakarta: Rajawali Pres, 2013).

⁷ Kutbuddin Aibak Abdurrahman Hakim, 'Poligami Dalam Islam: Studi Perbandingan Hukum Perkawinan Arab Saudi, Pakistan Dan Indonesia.', *Ahkam*, 9.1 (2021), p.108–15.

⁸ Muhamad Muslih, 'Perbandingan Prosedur Perkawinan Adat Baduy Dengan Kompilasi Hukum Islam', *Kanun Jurnal Ilmu Hukum*, 21.3 (2020), 444–45 <<https://doi.org/10.24815/kanun.v21i3.14302>>.

⁹ Mira Hardianti Solihah, 'Syarat Poligami Menurut UU No. 1 Tahun 1974 Tentang Perkawinan Dan Rancangan Qanun Aceh Tahun 2019 Tentang Hukum Keluarga', 2020.

is not in line with the issue of equal rights. In addition, this form of polygamous marriage considered a marriage that has the potential to cause harm to women, children, and the difficulty of achieving a happy and prosperous household. marriage order polygamy in particular does not violate and harm the rights of wives and in general protecting women, the marriage law establishes the conditions and procedures for marrying more than one (polygamy) strictly. Polygamy in Indonesia is regulated in the Marriage Act 1974, KHI and Government Regulation No. 9 of 1975 on the implementation of the law Marriage (hereinafter written PP No. 9/1975).

Differences between Indonesian, Egyptian and Kenyan polygamy laws create interest for the author to conduct comparative law research using Comparative Law theory. In this research the issue of having more than one wife or polygamy is examined by way of Comparative Law, which compares the provisions of polygamy under Indonesian law with Egypt and Kenya.

2. Research Method

This study uses the type of normative legal research. Normative legal research is a type of research that assesses a legislation and conducted by conducting research literature, research approach methods law consists of legislation approach, conceptual approach and case approach. But in this study, the approach used, namely the approach of legislation, this means that a problem will be seen in terms of legal aspects and also by reviewing the legislation which is then associated with the problems discussed, regarding the responsibility of heirs in the return of state assets resulting from corruption committed by convicts who died. In addition, the sources of legal materials used in this study, namely primary and secondary legal materials where according to that there are three sources of legal materials, namely primary, secondary, and tertiary.

3. Results and Discussion

A. Comparison of polygamy laws in Indonesia Egypt and Kenya

Polygamy is one form of marriage that is known general, although there are pros and cons in the application of marriage polygamy. some countries choose to ban the practice of polygamy although most or majority of the population is Muslim, because in Islamic law, it is permissible to practice polygamy must be able to behave fairly with their wives and his children. Fair behavior is difficult to do it has been reminded in the Quran Surat An-Nisa'verse 129 that is fair in order in polygamy is fair about the affairs of good maintenance dhohir and inner, Fair about love is difficult to do because who is able to turn the human heart is Allah Swt, so that in polygamy cases the majority of husbands will be more likely to love his new wife ¹⁰.

¹⁰ Khoirul Amru Harahap, 'Kebijakan Pemerintah Republik Indonesia Dan Hukum Islam Mengenai Poligami: Sebuah Kajian Perbandingan', *Volksgeist: Jurnal Ilmu Hukum Dan Konstitusi*, 2.1 (2019), p. 92 <<https://doi.org/10.24090/volksgeist.v2i1.2684>>.

The problem of polygamy is very complex and diverse make some countries adhere to a closed monogamous system that prohibits polygamy, although most of the population is Muslim Turkey and Tunisia. According to those who establish a closed monogamous system, polygamy only causes misery for men and women can't be fair as stated in the Qur'an, the most it is enough to be married to a wife. Despite this, the fact there are various negative impacts that occur with the system closed monogamy is a lot of adultery between men who has married a woman other than his wife because it can not channeling the desires of men who sometimes can not be fulfilled by a wife only.

Positive and negative effects of monogamous marriage closed make some countries have to implement the system open monogamy is for men more important to do marriage with a wife only if it is necessary to perform polygamy must meet the requirements that have been determined by law and Islamic law. some countries those who choose to embrace the principle of open monogamous marriage are Countries Indonesia, Egypt and Kenya. All three countries are equally regulating polygamous marriage or called marriage with more than one wife. Willbut the difference though in the Qur'an, Hadith and other sources of Islamic law regulates maximum limit in polygamy but in the arrangement of two countries they have different settings ¹¹.

Differences in regulation regarding polygamy restrictions in Indonesia, Egypt and kenya are influenced by their respective cultures and legal histories each country ¹². The majority of Indonesians are Muslims Sunnis in their laws expressly provide for the limitation of polygamy four wives at the same time. This is in accordance with interpretation of the verses of the Qur'an surat An-Nisa ' verse 3 and Hadith of the Prophet Muhammad According to the interpretation of the Sunnis, and understanding of the interpretation of the verse by other groups is considered contradictory and not recognized by The Marriage Act and the compilation of Islamic law in the country Indonesia ¹³. Whereas in Egypt, Kenyans whose population is Muslim are a minority consisting of several equally recognized groups whether it is a Muslim who adheres to the Sunni, Shia or Zahirian sect. The form of recognition is contained in the Marriage Act in Kenya has no limit on the maximum number of polygamists, but restore the application of Islamic law on each group.

The Muslim population in Kenya consists of several groups Article 49 paragraph 3 of the Marriage Act of Kenya 2014 law is when the rules of the law contrary to dalam Islamic law is believed, then it does not need to be implemented as well when there are rules that have not been set in law, then the limit- the limits are returned to the Islamic law adopted. Law Enforcement Islam in Kenya is led by a Khadi, so that each each group has its own Khadnya. Thus the limitation polygamy laws in Kenya vary according to the Sunnis are four people at the same time, the Shiites nine people at the same time and the group Zahiriah eighteen

¹¹ Avisena Aulia Anita, 'Perbandingan Pengaturan Asas Monogami Antara Negara Civil Law (Indonesia) Dan Common Law (Malaysia)', *Yurispruden*, 1.2 (2018), p. 62–65.

¹² Mohamad Faisal Aulia, 'Analisis Perbandingan Penerapan Hukum Keluarga Di Mesir Dan Di Indonesia', *Al-Ahwal Al-Syakhsiyyah: Jurnal Hukum Keluarga Dan Peradilan Islam*, 2.2 (2022), 4–8 <<https://doi.org/10.15575/as.v2i2.14327>>.

¹³ Nurrahmi Hayani Akbarizan, Nurcahaya, Sri Murhayati, 'Poligami Dalam Kasus Hukum', *Hukum Islam*, 3.2 (2021), p. 18–20.

Isri simultaneously. These differences are the background the Marriage Act of Kenya 2014 does not provide for in terms of polygamy.

In law Egypt Article 11 Bis of Law No.25 of 1929 as amended by Law No.100 of 1985 husband he must inform his first wife in court of the want to do a second marriage. It also requires that the husband notify his marital status on the marriage document, in the event that he has married, he must disclose the name of his wife or wives, his place of residence. Parties the authority will then notify this marriage to the wife or wife his wife. Based on The same person has the right to request a divorce the harm suffered by him, both physical and moral harm ¹⁴.

Similarities and differences regarding polygamous arrangements for people Islam in Indonesia Egypt and kenya Kenya and the shortcomings and advantages of polygamy arrangements for Muslims who are analyzed based on Islamic law will be presented as follows:

1. According to Indonesian law, under Article 3 Paragraph (2) of the Marriage Act 1974 and according to Egyptian law Article 11 Bis Law No.100 of 1985 polygamous marriages. In Indonesia, polygamy requirements stipulated in Article 5 Paragraph (1) of the law Marriage Act of 1974 and in Egypt based on Article 2 The Constitution of Egypt Islamic law. In Article 4 paragraph (1) of the Marriage Act 1974 requires the husband who wants do polygamy to ask permission to the court first. Law in Egypt currently does not have a written legal basis (codification) but in the draft Recent legislation Egypt Personal Status Law is set out in Article 14 is related conditions that must be met to perform polygamy Indonesia's obligations notification and permission from the first wife is regulated in Article 3 Paragraph (1) and Article 5 Paragraph (1) letter A of the Marriage Act 1974 while in Egypt regulated in Article 11 Bis Law 100 of 1985. Both in Indonesia and Egypt there are provisions on sanctions for the parties violation of the provisions on polygamy. In Indonesia this sanction contained in Article 45 paragraph (1) letters A and B PP No.9 of 1975, while in Egypt set in Law No. 100 of 1985 Article 23 Bis. The difference between Indonesia and Egypt lies in the fact that Indonesian law is more detailed and complete than Egyptian law in matters marriage and polygamy. Even Indonesia has 3 provisions governing polygamy is the Marriage Act 1974, PP No.9/1975 on the implementation of the law on marriage and Inpres No.1 of 1991 (KHI). While Egypt at this time the provisions governing polygamy is only in Law No.100 of 1985 amending Decree-Law No 25 of 1920 and 1929, while for other marital problems are still derived from sharia law Islam.
2. Kenya's polygamy law exempts everyone who believes Islamic law and customary law can perform polygamy with the provisions as a potentially polygamous marriage and marriage under Christian, Hindu and civil beliefs constitute monogamous marriage the law is contained in Article 6 paragraph (2) and (3) The Mariage Act of Kenya 2014.26 Kenya in its marriage law regulates further related potentially polygamous marriages

¹⁴ Raka Haikal Anfasya and Natasya Yunita Sugiastuti, 'PERKAWINAN POLIGAMI DI INDONESIA DAN MESIR', 5.2 (2023), p. 349.

can be converted into monogamous marriages as stipulated in Article 8 paragraph 1-3 The Marriage Act 2014 of Kenya ¹⁵.

Indonesia has more complete polygamous marriage rules and detailed. In Indonesia there are 3 provisions governing polygamy, namely the law Marriage 1974, PP No. 9/1975 and KHI, while the provisions governing polygamy in Egypt is only in Law No. 100 of 1985, as for other marital problems it is still the source of Islam.

Polygamy laws for Muslims in Indonesia and Kenya create interest for authors to conduct comparative research the law of polygamy uses the theory of Comparative Law. According To Walter Joseph Kamba there are three phases in the comparison process, namely phase descriptive, identification phase and explanation phase. the third phase is very influenced by three factors, namely the view of comparative jurisprudential, social context and systems are compared and the legal context of topics covered in micro comparisons.

The Muslim population in Kenya consists of several groups Article 49 paragraph 3 of the Marriage Act of Kenya 2014 law is when the rules of the law contrary to dalam Islamic law is believed, then it does not need to be implemented as well when there are rules that have not been set in law, then the limit- the limits are returned to the Islamic law adopted. Law Enforcement Islam in Kenya is led by a Khadi, so that each each group has its own Khadnya ¹⁶. Thus the limitation polygamy laws in Kenya vary according to the Sunnis are four people at the same time, the Shiites nine people at the same time and the group Zahiriah eighteen Isri simultaneously. These differences are the background the Marriage Act of Kenya 2014 does not provide for in the number of polygamy¹⁷.

While the difference between about the legal system, the condition of the population, understand or group in Islam, the minimum age of marriage, polygamy, terms of polygamy law, terms of polygamy, polygamy procedure, and the maximum number of polygamous. the first Indonesian state legal system is a Civil Law system that is influenced by history Indonesian state which was colonized by the Dutch who embraced legal system of Civil Law system, so long enough the Netherlands colonize Indonesia has become accustomed to using the system the law so that in sahkanlah as a form of legal system in Indonesia has a Civil Law system. The same applies to Kenya which became a colony of Portuguese and British so that the system the law used is the Common Law system as well as the country that owns the table ¹⁸.

Equality of polygamy laws between Indonesia and the state Kenya consists of several aspects of the form of the state, the form government, the principle of marriage, and the application of polygamous laws. first, the form of the state of Indonesia and the state of Kenya are both unitary states, which means that the state of Indonesia and the state of Indonesia are only one and do not consist of states. Both forms of the state of Indonesia

¹⁵ A. Hasyim Nawawi Dewi Ulfa Lailatul Fitria, 'Perbandingan Hukum Poligami Bagi Orang Islam Di Negara Indonesia Dan Negara Kenya', *Uniska Law Review*, 2.1 (2021), p. 36–38.

¹⁶ Mimbar Akademika, 'Poligami Dalam Perspektif Hukum Islam (Kajian Tafsir Ahkam)', *Mimbar Akademika*, 8.1 (2023), p. 88–93.

¹⁷ Peter de Cruz, *Perbandingan Sistem Hukum* (Jakarta: Nusa Media, 2012).

¹⁸ Muhammad Jafar Shiddiq, 'Sejarah Tradisi Budaya Poligami Di Dunia Arab Pra Islam (Perspektif Tradisi Coomans Mikhail)', *Titian: Jurnal Ilmu Humaniora*, 7.1 (2023), p. 4–8 <<https://doi.org/10.22437/titian.v7i1.23588>>.

and the state of Kenya are republics although Indonesia is a presidential republic while Kenya it is a presidential republic. The three countries of Indonesia and Kenya both countries that adhere to the principle of monogamy is better for men to marry only one wife willbut also giving leeway for the occupation to choose marriage monogamous or polygamous with various conditions that have determined. The four most important countries of Indonesia and the country Kenya is both a country that implements polygamy laws or allowed its inhabitants to practice polygamy, although with the provisions must meet the conditions that have been determined.

The condition of the population of Indonesia is the majority Muslims make up about 80% of the total population while the country of Kenya is a religious minority population Islam with a percentage of approximately 10% of the total the people of Kenya as well as the minimum age of marriage, the Indonesian state regulates The minimum age of marriage is 19 years for men and girls. Kenya's minimum age for marriage is 18. fifth law of polygamy, in the state Indonesia allows polygamy but with supervision strict that must meet the requirements specified in laws and regulations, so that if they do not meet the requirements not allowed for polygamy. In the country of Kenya divide marriage into two groups, namely monogamy and potential polygamy or polygamy, so that if included in the group potentially polygamous or polygamous then automatically allowed to polygamy ¹⁹.

Indonesia before husband doing polygamy it must be with the permission of the wife in advance court if the wife does not give permission or does not allow to give permission, then the panel of judges will give independent judgment based on the facts at trial whether permission to be polygamous or not. In the country of Kenya no or rules regarding the permission of the wife willbut there are only provisions like willingly from the wife so that the wife does not have the authority to refuse the decision of her husband to be polygamous.

4. Conclusion

Egypt is a country that adheres to the law, according to Egyptian law Article 11 Bis law No. 25 of 1929 as amended by law No. 100 of 1985 the husband is obliged to notify his first wife in court of his desire to enter into a second marriage. It also requires that the husband notify his marital status on the marriage certificate, in the event that he has married, he must indicate the name of his wife or wife, where he lives. Kenya's marriage law allows polygamy under the terms included in a potentially polygamous or polygamous marriage and only requires volunteering between a man and a woman to be married without setting a limit on the maximum number in polygamy. The existence of similarities and differences between the two countries compared then it can be known the advantages and disadvantages of each polygamy law for Muslims in Indonesia and Kenya. Indonesian law guarantees more legal protection for women and restricts the rights of men. Kenyan law grants free rights to men, and does not provide adequate legal protection for women.

¹⁹ Wahidullah, 'Rekonstruksi Persyaratan Poligami Dalam Perkawinan Indonesia Berbasis Keadilan', 2019.

References

- Abdurrahman Hakim, Kutbuddin Aibak, 'Poligami Dalam Islam: Studi Perbandingan Hukum Perkawinan Arab Saudi, Pakistan Dan Indonesia.', *Ahkam*, 9.1 (2021), 108–15
- Akademika, Mimbar, 'Poligami Dalam Perspektif Hukum Islam (Kajian Tafsir Ahkam)', *Mimbar Akademika*, 8.1 (2023), 88–93
- Akbarizan, Nurcahaya, Sri Murhayati, Nurrahmi Hayani, 'Poligami Dalam Kasus Hukum', *Hukum Islam*, 3.2 (2021), 18–20
- Anfasya, Raka Haikal, and Natasya Yunita Sugiastuti, 'PERKAWINAN POLIGAMI DI INDONESIA DAN MESIR', 5.2 (2023), 349
- Aulia, Mohamad Faisal, 'Analisis Perbandingan Penerapan Hukum Keluarga Di Mesir Dan Di Indonesia', *Al-Ahwal Al-Syakhsyiyah: Jurnal Hukum Keluarga Dan Peradilan Islam*, 2.2 (2022), 4–8 <<https://doi.org/10.15575/as.v2i2.14327>>
- Avisena Aulia Anita, 'Perbandingan Pengaturan Asas Monogami Antara Negara Civil Law (Indonesia) Dan Common Law (Malaysia)', *Yurispruden*, 1.2 (2018), 162–65
- Dedi Supriyadi, Mustofa, *Perbandingan Hukum Perkawinan Di Dunia Islam* (Bandung: Pustaka Setia, 2011)
- Dewi Ulfa Lailatul Fitria, A. Hasyim Nawawi, 'Perbandingan Hukum Poligami Bagi Orang Islam Di Negara Indonesia Dan Negara Kenya', *Uniska Law Review*, 2.1 (2021), 36–38
- Elva Mahlida, 'Penafsiran Poligami (Studi Perbandingan Tafsir Muhammad 'Ali Al-Sabuni Dan Siti Musdah Mulia)', 2017
- Harahap, Khoirul Amru, 'Kebijakan Pemerintah Republik Indonesia Dan Hukum Islam Mengenai Poligami: Sebuah Kajian Perbandingan', *Volksgeist: Jurnal Ilmu Hukum Dan Konstitusi*, 2.1 (2019), 92 <<https://doi.org/10.24090/volksgeist.v2i1.2684>>
- Mira Hardianti Solihah, 'Syarat Poligami Menurut UU No. 1 Tahun 1974 Tentang Perkawinan Dan Rancangan Qanun Aceh Tahun 2019 Tentang Hukum Keluarga', 2020
- Muslih, Muhamad, 'Perbandingan Prosedur Perkawinan Adat Baduy Dengan Kompilasi Hukum Islam', *Kanun Jurnal Ilmu Hukum*, 21.3 (2020), 444–45 <<https://doi.org/10.24815/kanun.v21i3.14302>>
- Peter de Cruz, *Perbandingan Sistem Hukum* (Jakarta: Nusa Media, 2012)
- Rumbia, Rusji, Fokky Fuad Wasitaatmadja, and Susianto Susianto, 'Poligami Indonesia Dan Malaysia Sebuah Perbandingan Atas Keberlakuan Hukum Islam', *Jurnal Magister Ilmu Hukum*, 5.2 (2021), 4–8 <<https://doi.org/10.36722/jmih.v5i2.791>>

- Sartika, La Ode Gusman Nasiru Salam dan Eka, 'Poligami Dan Pelakor , Refleksi Dalam Film Dan Realitas Masyarakat Gorontalo : Sebuah Studi', *Jurnal Bahasa, Sastra, Dan Budaya*, 13.2 (2023), 112
- Shiddiq, Muhammad Jafar, 'Sejarah Tradisi Budaya Poligami Di Dunia Arab Pra Islam (Perspektif Tradisi Coomans Mikhail)', *Titian: Jurnal Ilmu Humaniora*, 7.1 (2023), 4–8 <<https://doi.org/10.22437/titian.v7i1.23588>>
- Tihami and Sobari Sahrani, *Fiqh Munakahat: Kajian Fiqih Lengkap* (Jakarta: Rajawali Pres, 2013)
- Wahidullah, 'Rekonstruksi Persyaratan Poligami Dalam Perkawinan Indonesia Berbasis Keadilan', 2019
- Yudi Prihartanto Soleh, 'Pembaharuan Undang-Undang Perkawinan Perihal Poligami Berdasarkan Hukum Perkawinan', *Jurnal Soshum Insentif*, 2.1 (2019), 2
<<https://jurnal.ildikti4.or.id/index.php/jurnalsoshum/article/view/42>>